
No. 18-3071

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

IN RE GRAND JURY SUBPOENA

Appeal from the United States District Court
For the District of Columbia
Case No. 18-gj-0041

**COUNTRY A'S RESPONSE TO
THE REPORTERS COMMITTEE FOR FREEDOM
OF THE PRESS'S MOTION TO UNSEAL**

On January 9, 2019, the Reporters Committee for Freedom of the Press moved this Court to unseal the briefs, record, and oral-argument transcript in this appeal.

Country A takes no position on that motion.¹

Respectfully submitted on January 16, 2019.



Brian D. Boone
ALSTON & BIRD LLP
101 S. Tryon Street, St. 4000
Charlotte, NC 28280
(704) 444-1000

Edward T. Kang
ALSTON & BIRD LLP
950 F Street, NW
Washington, DC 20004
202-239-3000

¹ Because of the sealing order in place, we refer to the appellant as "Country A." Country A is a wholly owned agency or instrumentality of a foreign state, so it qualifies as a foreign state under the Foreign Sovereign Immunities Act (FSIA). This Court has previously referred to Country A as "the Corporation."

brian.boone@alston.com

edward.kang@alston.com

**CERTIFICATE OF COMPLIANCE WITH TYPE-VOLUME
LIMIT, TYPEFACE REQUIREMENTS, AND
TYPE-STYLE REQUIREMENTS**

1. This document complies with the word limit of Fed. R. App. P. 27(d)(2), because, excluding the parts of the document exempted by Fed. R. App. P. 32(f), this document contains 86 words.
2. This document complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type-style requirements of Fed. R. App. P. 32(a)(6) because it has been prepared in a proportionally spaced typeface using Microsoft Word 2013 in Century Schoolbook size 14 font.

Respectfully submitted on January 16, 2019.

ALSTON & BIRD LLP



Brian D. Boone (D.C. Bar. 987633)
Bank of America Plaza, Suite 4000
101 S. Tryon St.
Charlotte, NC 28280
Telephone: 704.444.1000
Fax: 704.444.1111
brian.boone@alston.com

Counsel for Country A

CERTIFICATE OF SERVICE

I certify that today I served this **Response to the Reporters Committee for Freedom of the Press's Motion to Unseal** by email on the Government.

Respectfully submitted on January 16, 2019.

ALSTON & BIRD LLP



Brian D. Boone (D.C. Bar. 987633)
Bank of America Plaza, Suite 4000
101 S. Tryon St.
Charlotte, NC 28280
Telephone: 704.444.1000
Fax: 704.444.1111
brian.boone@alston.com

Counsel for Country A